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6/30/20

June 30, 2020

Via ECF

The Honorable Colleen McMahon Chief Judge U.S. District Court Southern District of New York 500 Pearl Street New York, New York 10007

Sentencias Adj to Oct 15,2020

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Re:

Dear Chief Judge McMahon:

As you know, I represent Mayra Monsanto in the above-referenced matter. I write to request: (1) that Ms. Monsanto's sentencing be rescheduled from July 16, 2020, to October 15 or 16, 2020, if the Court is available – the parties are available on both dates; and (2) that the Court permit Ms. Monsanto's electronic monitoring ankle bracelet be removed for her to obtain a necessary MRI on July 14, 2020, at 11am.

An adjournment of Ms. Monsanto's sentencing is necessary given the global pandemic that has affected my ability to meet and speak to my client and the necessary affect it has had on Court operations. Ms. Monsanto contracted COVID-19 and was very sick in April and May - I did not have the ability to meet with her and my office has still not opened. Thankfully she has recovered but is still in need of continued medical attention to address myriad of health conditions from which she suffers. Ms. Monsanto has a scheduled MRI on Juy 14, 2020, at 11am, at Columbia Orthopedics, The Allen Pavilion, 5141 Broadway, 3rd Floor, West Room 22, New York, New York 10034. Accordingly, we respectfully request that Ms. Monsanto be permitted to attend the MRI and that Pretrial Services be ordered to work with her to remove her ankle monitoring bracelet. I have conferred with the government and it joins in the application to adjourn the sentencing and does not object to the removal of her ankle bracelet for the MRI.

Respectfully submitted,

César de Castro

USDC SDNY

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